

Monsanto

The Chemical Group
800 N. Lindbergh Boulevard
St. Louis, Missouri 63167
Phone: (314) 694-1000

received 12/19/94
SB

145168

December 15, 1994

Mr. Samuel F. Borries
U.S. Environmental Protection
Agency, Region V
Waste Management Division
77 West Jackson Boulevard
HSE-5J
Chicago, IL 60604

Re: Sauget Area 1, Sauget, IL
Site G--Scope of Work

Dear Mr. Borries:

As we have discussed, Monsanto is presently attempting to ascertain whether it is in a position to voluntarily address concerns over environmental conditions at Site G in Sauget Area 1, Sauget, Illinois. While many questions of a legal nature will eventually need to be resolved as to any voluntary action on the part of Monsanto, we first wish to achieve a common understanding with both federal and state agencies as to the nature of the work itself.

Accordingly, we have prepared the attached Scope of Work describing our understanding of how Monsanto could carry out this work. Please note that, in order to achieve maximum mitigation/elimination of alleged releases/threats at Site G, Monsanto now is proposing that the portion of Dead Creek Section B adjacent to Site G also should be addressed.


We request that the U.S. Environmental Protection Agency (U.S. EPA) and the Illinois Environmental Protection Agency (IEPA) review this Scope of Work and provide us with any concerns or comments. If all parties are able to achieve basic concurrence in this course of action, we then can proceed to explore the legal framework under which the work could actually be carried out.

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It is Monsanto's understanding that U.S. EPA would like this work to begin at Site G no later than May 1, 1995. Therefore, we request that any comments and concerns on the attached Scope of Work, either substantive or editorial, be sent to us no later than January 3, 1995. We then can proceed to put the Scope of Work into final form; and if all parties are agreeable, establish a schedule for resolution of the other outstanding issues so that Monsanto could initiate this action by the May 1, 1995, date. Monsanto's Environmental counsel, Stephen Krchma, will contact Thomas Martin to initiate discussions on these other issues and the schedule for their resolution.

In the meanwhile, if you have any questions or need additional information pertaining to this matter, please advise.

Sincerely,



Eugene F. Stecher
Project Manager

Attachment

cc: Jeffrey Gore (U.S. EPA)
Thomas Martin (U.S. EPA)
Paul Takacs (IEPA)
M. R. Foresman
S. P. Krchma
D. M. Light
S. D. Smith

MONSANTO COMPANY
SCOPE OF WORK
SAUGET AREA 1
SITE G AND DEAD CREEK

Introduction

The activities necessary to achieve an appropriate solution to Sauget Area 1, Site G, are described below. These activities include the adjacent portion of Dead Creek, Section B, to ensure that any threat to public health or welfare or the environment from either Site G or the adjacent portion of Dead Creek is appropriately mitigated or eliminated. Monsanto shall solicit the services of qualified contractors to perform this work and develop the necessary work plans, specifications and drawings. All work shall be in accordance with applicable federal, state and local regulations.

Summary of Work

The work on Site G and the portion of Dead Creek, Section B, adjacent to Site G consists of placement of all affected material outside the fenced boundaries of Site G back on to Site G, cleaning the site of brush, trees and vegetation and placement of this material on the site, placement of a liner (either clay or HDPE) over this material, covering this liner with a minimum of 2'0" of earthen material, placement of 6" of topsoil atop the earthen material and seeding. A detailed description of this work is shown below.

Design

Monsanto shall solicit bids from qualified contractors to perform the necessary design needed to perform the work. The selected contractor shall perform the following:

Develop Health and Safety Plan that will cover all field activities whether performed during design or cleanup.

Develop topographic survey of Site G, Dead Creek, Sector B, adjacent to Site G and other adjacent areas needing removal activities. Elevations will be determined on a 50 to 100 foot grid and all other major obstructions noted.

Develop a Sampling and Analysis Plan to assure that removal of material from areas adjacent to Site G have been excavated to proper depth.

Develop a Quality Assurance Project Plan to assure that every aspect of the work is performed properly.

Site G
Scope of Work (Continued)

Perform a cut and fill analysis to minimize the need for bringing fill material to the site. This analysis will include off-site soils that are adjacent to the site. Using the data generated from this analysis design grading plan for the entire site.

Develop specifications for clearing and grubbing, site grading, stabilization of oil pits, compaction requirements and any other items necessary to assure that the final site grading will not be sub-acceptable to differential settlement.

Develop plan and specifications to assure that all offsite surface material from areas adjacent to Site G and the portion of Dead Creek Section B adjacent to Site G has been properly excavated and placed on to Site G within the fenced boundary. (See Attachment A for location of this material.)

Develop specifications for purchase and installation of a 60 mil HDPE liner that will be placed over the entire site.

Develop specification for purchase and placement of 2'0" of earthen material that will be placed atop the HDPE liner.

Develop specification for proper closure of any existing monitoring wells that may interfere with final cap placement.

Develop method for testing water in depressed area to determine if treatment is needed prior to disposal.

Develop all drawings necessary to assure that work activities can proceed in an orderly manner.

Remediation

Upon completion of design and approval by USEPA, Monsanto shall select a contractor to perform the work. The selected contractor shall perform the following:

Provide milestone schedule showing start and completion of all activities.

Mobilize necessary equipment and office trailers to location adjacent to Site G.

Set up necessary decon facilities both for equipment and personnel.

Site G
Scope of Work (Continued)

Set up other temporary facilities necessary to assure that the work is performed properly.

Perform the work in accordance with the EPA-approved design and specifications.

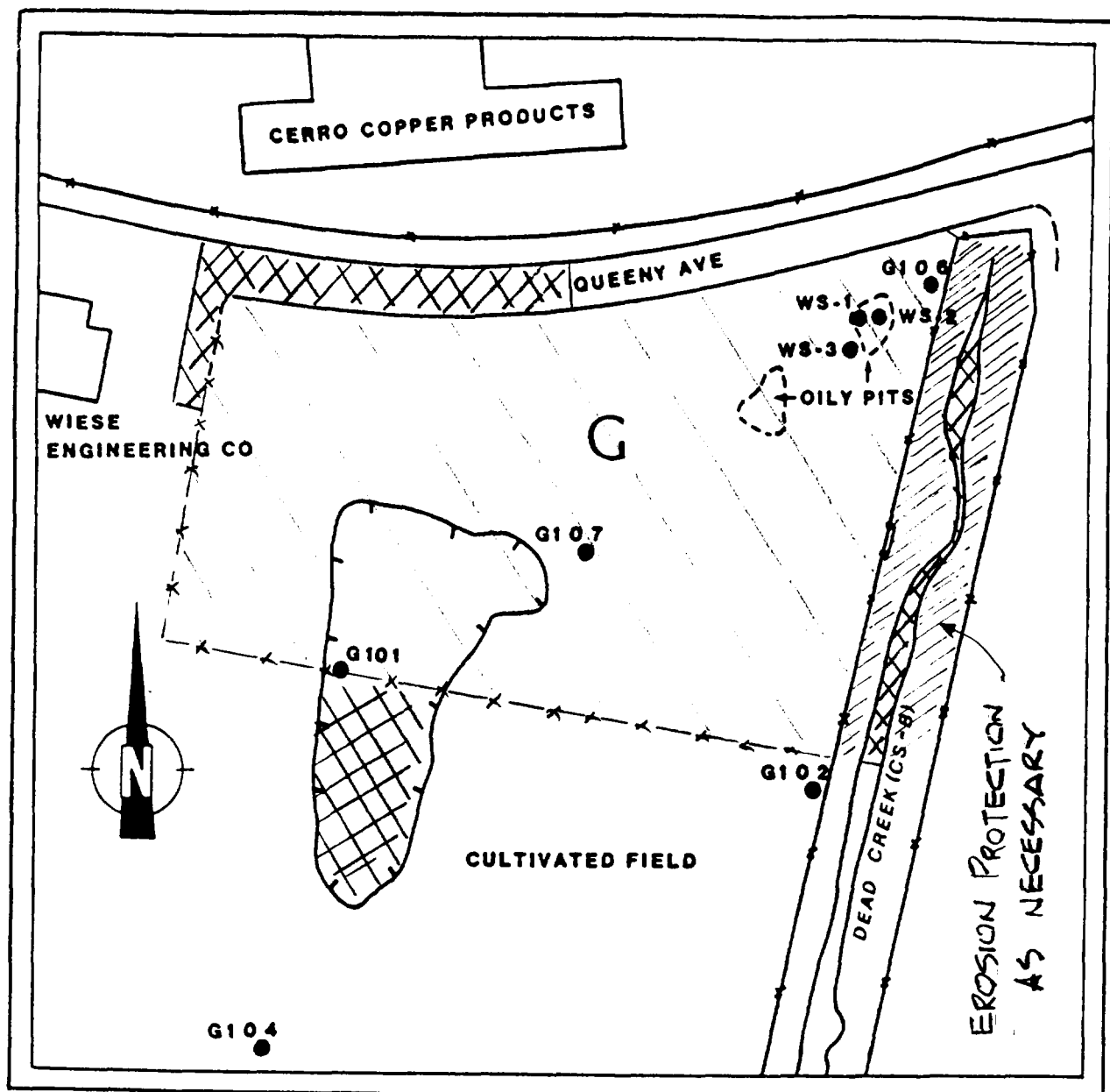
Purchase all material needed to perform the work in accordance with the drawings and specifications.

Provide personnel needed to assure that compaction requirements have been achieved in accordance with the specifications.

Upon completion of the work, demobilize all equipment and temporary facilities leaving the site clean and free from construction trash and debris.

Management

Monsanto shall provide Project Management to ensure that all contractors are performing in accordance with the EPA-approved design and specifications. A Monsanto Project Manager will review all design documents with the Design Contractor prior to submittal to EPA for approval and will coordinate all EPA comments, concerns and questions. This same Project Manager will be located at the site during work activities to assure that the contractor is performing in accordance with the drawings and specifications.



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SCALE

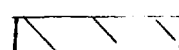
LEGEND

G106

IEPA MONITORING WELL

WS-1

IEPA WASTE SAMPLING LOCATION



CAPPED AREA



OFFSITE MATERIAL
TO BE PLACED
ON-SITE

FIGURE G-1

DEAD CREEK SITE AREA G WITH SAMPLE LOCATIONS

ATTACHMENT A